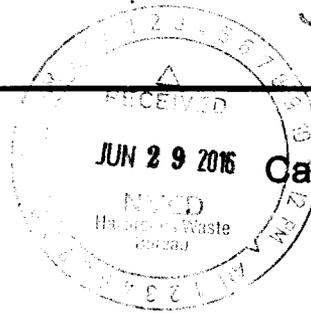


United States Government


 Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88220


DATE: JUN 29 2016

REPLY TO
ATTN OF: CBFO:TSTD:KW:GL:16-1949:UFC 5900.00

SUBJECT: WIPP Certified Program Notification - Discontinue WIPP TRU Waste Container Certifications Until a Recertification Decision is Issued

TO: Distribution

Since the events at the Waste Isolation Pilot Plant (WIPP) in February 2014, many changes have been made to the WIPP safety management programs and governing requirements. A new WIPP Documented Safety Analysis (DSA) was implemented on May 30, 2016. This new DSA contains conditions and limitations that required changing the WIPP Waste Acceptance Criteria (WAC). Revision 8 of the WIPP WAC was approved on June 21, 2016, with an effective date of July 5, 2016. These revised criteria must be incorporated into WIPP certified programs' plans and implementing procedures. WIPP WAC Revision 8 has been sent electronically to each Department of Energy (DOE) transuranic (TRU) waste site and WIPP certified program.

The purpose of this memorandum is to notify each of you that WIPP certified programs must cease TRU waste certification activities on July 5, 2016. WIPP certified programs shall modify their waste certification plans and affected implementing procedures and provide those changes to the DOE Carlsbad Field Office (CBFO) for adequacy review and approval.

The new requirements for recertification include:

- Generator Site Technical Reviews
 - Performed by the CBFO and the WIPP Management and Operating (M&O) Contractor to ensure waste packaging and treatment activities are performed under adequate control and waste information is accurately communicated to the WIPP certified program to assure WIPP WAC compliance. A complete Generator Site Technical Review must be performed at each site prior to the shipment of any waste containers certified under the new WIPP WAC;
- Acceptable Knowledge Enhancements
 - Interface Waste Management Documents List (IWMDL)
 - Identifies DOE Site plans, procedures, and reports associated with current waste management and packaging activities to be reviewed for accuracy before containers are added to the Waste Containers List or Container Tracking Spreadsheet in order to continue characterization activities;
 - Enhanced Chemical Compatibility Evaluation
 - Documented process based upon *A Method for Determining the Compatibility of Hazardous Wastes*, EPA-600/12-80-076, April 1980;
 - Performed for waste streams or waste stream sub-populations;
 - Requires review and approval by the CBFO;
 - Basis of Knowledge for Evaluating Oxidizing Chemicals in TRU Waste
 - Required use for waste streams with oxidizing chemicals (solids, solutions, previously sorbed (neutralized or not), sorbed into soils);

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- Expected to be issued by the CBFO in September 2016.
- WIPP Certified Program Acceptable Knowledge (AK) Assessments
 - To ensure that the AK documentation relating to the management of potentially reactive, corrosive, ignitable, and incompatible TRU waste is adequate, current, and accurately described in existing AK Summary Reports.

In order for a WIPP certified program to return to certified status, revised plans and procedures must be approved and implemented. The WIPP certified program must pass an audit or surveillance as determined by the CBFO.

It is important to note that containers certified prior to implementation of the WIPP WAC Revision 8 will remain certified unless reviews of AK or analysis of chemical compatibility identify the need for additional investigation or treatment. All currently certified waste containers, as well as those containers continuing to be certified up to July 5, 2016, will undergo the following prior to shipment:

- WIPP certified programs will implement an enhanced AK process including an enhanced chemical compatibility evaluation for the waste streams, or waste stream sub-populations, and submits to the CBFO for review;
- WIPP certified programs will implement the Basis of Knowledge (when provided by the CBFO) document in the AK process for evaluating oxidizing chemicals in TRU waste streams to determine acceptability or need for treatment;
- The CBFO will concur with enhanced chemical compatibility evaluation and implementation of the Basis of Knowledge for the evaluated waste stream;
- The CBFO will approve waste streams with acceptable enhanced chemical compatibility evaluation and Basis of Knowledge documentation provided by the WIPP certified programs;
- WIPP M&O Contractor Payload Engineers will evaluate TRU waste content (TRUCON) codes to ensure compliance with the enhanced chemical compatibility evaluation;
- The WIPP M&O Contractor will implement additional checks in the WIPP Waste Data System (WDS) for each container before those containers can be used to populate payloads in WDS;
- The WIPP M&O Contractor will obtain written approval from the CBFO prior to release of waste streams for shipment;
- The WIPP M&O Contractor will verify each container requested is part of a CBFO-approved waste stream and authorizes shipment in WDS.

In the meantime, the CBFO will work with each DOE site to facilitate this process and minimize the timeframe necessary to lift the HOLD and return to certifying containers. Shipments to WIPP will not resume until all WIPP restart activities are completed.

If you have any questions, please contact Mr. J.R. Stroble, Director, TRU Sites and Transportation Division, at (575) 234-7313.



Todd Shrader, Manager
Carlsbad Field Office

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